

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

United States District Court

Northern District of Texas 2015 JUN 30 AM 11:52

Jeremy Pinson,
Plaintiff,

DEPUTY CLERK RAN

v.
Jose Santana and
Federal Bureau of Prisons,
Defendant

Case No. **3-15CV-2190M**

CIVIL COMPLAINT

I. Jurisdiction:

1. Jurisdiction is asserted pursuant to 28 U.S.C. 1332, 1331 and *Bivens v. Six Unknown Agents*, 403 U.S. 388 (1971).

II. Parties:

1. Plaintiff Jeremy Pinson is a transgender federal prisoner.
2. Defendant Jose Santana is Chief, BOP Designation and Sentence Computation Ctr., 3416 Marine Forces Drive, Grand Prairie, Texas, 75051. ("DSCC").
3. Defendant Federal Bureau of Prisons ("BOP") operates the DSCC.

III. Statement of Facts:

1. Plaintiff is serving a 252-Month prison sentence in the custody of the BOP. She is diagnosed with Gender Dysphoria and has been attacked

and almost killed numerous times. (Please take Judicial Notice of Summary Judgment decision in *Pinson v. Prieto*, No. 10-cv-811 (C.D. Cal. 2014)).

2. The DSCC and Jose Santana choose prisons for federal inmates to serve their sentences.
3. USP Florence is a Maximum Security penitentiary. It is one of 117 BOP facilities. It is one of the most dangerous of facilities because it houses inmates with the most violent criminal and institutional histories.
4. USP Florence has no history of treating Gender Dysphoria and its staff are completely unfamiliar with WPATH Standards of Care, the international standard, which calls for hormone therapy, living as a female, and psychotherapy. None of which is available at USP Florence.
5. USP Florence also houses numerous violent prison gangs including the Texas Syndicate, Mexicanemi and Texas Aryan Brotherhood.
6. In April 2015 defendant Santana moved plaintiff to USP Florence.
7. Shortly after arrival inmates sicced on the plaintiff's effeminate manner to call her "bitch" "punk" "faggot" and other derogatory terms and staff did nothing to protect her from verbal abuse.

8. Numerous efforts to obtain treatment for Gender Dysphoria were unsuccessful.
9. Defendants BOP and Santana knew from prison records plaintiff had gender dysphoria, a history of being victimized, knew USP Florence had an extremely violent population, knew USP Florence had no resources to treat gender dysphoria.
10. In May 2015 inmates began forcing plaintiff under threat of being stabbed to hold their shanks, drugs and other contraband in her cell. These inmates have physical contact out of the cell with her daily. One has threatened rape.

IV. Cause of Action :

1. Violation of 8th Amendment = Deliberate Indifference To Serious Medical Need - Gender Dysphoria (Claim One);
2. Violation of 8th Amendment = Deliberate Indifference To Safety (Claim Two).

V. Requested Relief:

1. Injunction compelling BOP to follow WPATH Standards of Care and Protect Plaintiff by transferring her to FMC Denver or other suitable facility.
2. Declaratory Judgment that defendants actions/omissions violated the 8th Amendment.

Executed under penalty of perjury 28 U.S.C. 1741b

Jeremy Pinson

Jeremy Pinson

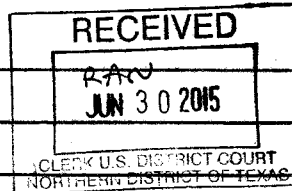
Reg. No. 1162167-064

USP Florence

PO Box 7000

Florence CO 81224

Dear Clerk,



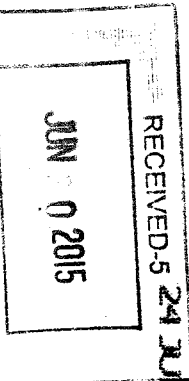
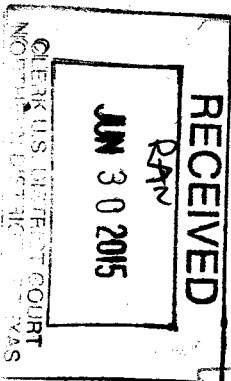
Please file this lawsuit and send
me an in forma pauper's application.

Sincerely,

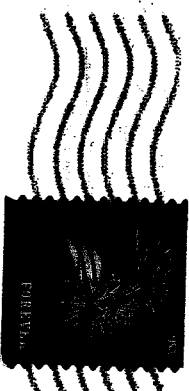
A handwritten signature in cursive script, appearing to read "Tom P.", written over a horizontal line.

Jeremy Pinson # 16267-064
United States Penitentiary
PO Box 7000
Florence CO 81226

Legal Mail



DENVER CO 802
RECEIVED-5 24 JUN 2015 PM 4 L



U.S. District Court
1100 Commerce St.
Dallas TX 75242

75242102759

